

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
(Newport News Division)

Trans-Radial Solutions, LLC,

Plaintiff,

v.

No. 2:18-cv-00656-RGD-RJK

Burlington Medical, LLC, Mr. John
Williams, Fox Three Partners, LLC, and
Phillips Safety Products, Inc.,

Defendants.

**DEFENDANTS' MOTION TO DISMISS COMPLAINT COUNTS IV, V, VI, VII, VIII,
IX, X, XI, XII AND XIII PURSUANT TO RULE 12(b)(6)**

Defendants Burlington Medical, LLC, John Williams, Fox Three Partners, and Phillips Safety Products, Inc. hereby move this Court to dismiss Counts, IV, V, VI, VII, VIII, IX, X, XI, XII and XIII of the Complaint with prejudice pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. The grounds for dismissal for failure to state a claim upon which relief can be granted are articulated in Defendants' Memorandum in Support filed with this Motion.

Respectfully submitted,

/s/ Rebecca S. LeGrand

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*Counsel for Defendants Burlington Medical,
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CERTIFICATE OF SERVICE

I certify that on February 11, 2019, a copy of the foregoing was served by electronically filing a copy with the clerk of the court using the ECF filing system which automatically notifies all registered counsel of record.

/s/ Rebecca S. LeGrand

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